OAR Box 1824

Prepped by Charmelle Mathews

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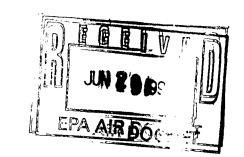
Phibro Energy, Inc.



June 5, 1990



P.O. BOX 5038, HOUSTON, TX 77262-5038



Mr. William K. Reilly Administrator The U.S. Environmental Protection Agency 401 M Street, N.W. Washington, D.C. 20460

Dear Sir:

We have reviewed the information presented by The Ethyl Corporation relating to the use of HiTEC 3000 in unleaded gasoline.

Based on this information, we support Ethyl in its waiver application for the use of HiTEC 3000 in unleaded gasoline.

It appears that the benefits are twofold, i.e., an improvement in tail pipe emissions and an economic benefit to the U.S. balance of payments.

Your consideration of our position is appreciated.

Sincerely,

Ronald W. Lewis Sr. Vice President

RWL:db

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